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REGENTS OF THE UNIVERSITY OF
CALIFORNIA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KATHERINE SAVIN,
Plaintiff,

v.

CITY AND COUNTY OF SAN
FRANCISCO; ARCHDIOCESE OF SAN
FRANCISCO; FATHER BRUCE LERY;
HEATHER HARRIS, M.D.; ANNE
KINDERMAN, M.D.; and DOES 1 through
10, inclusive,
Defendants.

AND RELATED CROSS-COMPLAINTS

Case No. 3:16-CV-05627-JST

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER SETTING
MOTIONS FOR DETERMINATION
OF GOOD FAITH SETTLEMENT**

Hon. Jon S. Tigar

Complaint Filed: October 4, 2016
Trial Date: None Set

Plaintiff KATHERINE SAVIN (“Plaintiff”) and Defendants CITY AND COUNTY OF SAN FRANCISCO (the “City”), THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO, A Corporation Sole (erroneously sued as the ARCHDIOCESE OF SAN FRANCISCO) (“ASF”), FATHER BRUCE LERY, and Cross-Defendant REGENTS OF THE UNIVERSITY OF CALIFORNIA (“Regents”) (together, “the parties”) by and through their counsel of record, jointly enter into the following stipulation:

Plaintiff has reached agreements to settle her claims against the Regents, ASF, and the City (contingent on approval by the City’s Board of Supervisors).

1 Defendants Regents and ASF have filed motions for good faith determination of settlement,
2 which are pending before this Court. The City will file its motion for good faith settlement no later
3 than Monday, May 21, 2018 (collectively, the "Motions"). The purpose of the Motions is to
4 extinguish all counterclaims, cross-claims, and third-party claims involving the settling parties
5 exclusively.

6 The parties stipulate and agree that holding one hearing date on the motions would be fair
7 and expeditious.

8 THEREFORE, the parties hereby stipulate that good cause exists to set the hearing on the
9 Motions on June 14, 2018, at 2:00 pm, with any opposition due no later than May 29, 2018. The
10 parties agree to have the Motions heard on shortened time, and without the need for reply briefs.
11 The parties agree that the Court may hear the motions without the need for oral argument,
12 particularly if no oppositions are filed.

13 The parties are not making this request for the purposes of delay, and no party would suffer
14 any prejudice if this stipulation were granted. Indeed, the parties believe that judicial economy can
15 best be served by ensuring that the Motions are heard at one time.

16 IT IS SO STIPULATED.

17 Dated: May 21, 2018

JACKSON LEWIS P.C.

18 By: /s/ Amelia Sanchez-Moran
19 Lisa Barnett Sween
20 Amelia Sanchez-Moran
21 Attorneys for Defendant
22 THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO, a corporation sole (erroneously
sued as the ARCHDIOCESE OF SAN
FRANCISCO)

23 By: /s/ David M. Poore
24 David M. Poore
25 Scott A. Brown
26 Attorneys for Plaintiff
27 KATHERINE SAVIN

28 By: /s/ Paul E. Gaspari
Paul E. Gaspari
Daniel C. Zamora
Attorneys for Defendant
FATHER BRUCE LERY

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By: /s/ Michael A. Laurenson
Michael A. Laurenson
Attorneys for Cross Defendant
REGENTS OF THE UNIVERSITY OF
CALIFORNIA

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DATED: May 21, 2018

By: /s/David M. Poore
DAVID M. POORE
Attorney for Plaintiff

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UNITED STATES DISTRICT COURT